

EXHIBIT C

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**COUNSEL FOR THE PEOPLE OF
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 21-30085-hdh-11
NATIONAL RIFLE ASSOCIATION	§	
OF AMERICA and SEA GIRT LLC,	§	Chapter 11
	§	
Debtors.¹	§	Jointly Administered

**NOTICE OF INTENTION TO TAKE ORAL
DEPOSITION OF THE HONORABLE PHILLIP JOURNEY**

To: The Honorable Phillip Journey, by and through counsel, M. Jermain Watson, 420 Throckmorton Street, Suite 1000, Fort Worth, Texas 76102.

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30, and Federal Rules of Bankruptcy Procedure 7026 and 7030, The State of New York, By Letitia

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

James, Attorney General of the State of New York (“**NYAG**”), by and through its attorneys, will take the oral deposition, of the Honorable Phillip Journey (“**Deponent**”), for the purposes of discovering matters relevant to the NYAG’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee and the NYAG’s Brief in Support (collectively, the “**NYAG Dismissal Motion**”); Ackerman McQueen Inc.’s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for Appoint of Chapter 11 Trustee, and Brief in Support (the “**AMc Dismissal Motion**”); and Deponent’s Motion for Appointment of Examiner (the “**Examiner Motion**”). The deposition shall begin on **March 11, 2021 at 3:00 p.m. (CST)**.

PLEASE TAKE FURTHER NOTICE that the above and foregoing deposition will (a) take place before a notary public; (b) be recorded by stenographic tape recording device and/or videotaped; and (c) be continued only upon agreement of all counsel and/or parties present.

PLEASE TAKE FURTHER NOTICE that the deposition will taken remotely via an online platform due to the coronavirus pandemic such that no one will need to be in the same location as anyone else in order to participate in the deposition by use of Zoom, Webex or other video conferencing software. Parties who wish to attend the deposition should contact Eric M. Van Horn, Spencer Fane LLP, at ericvanhorn@spencerfane.com **no fewer than 2 hours before the start of the deposition** for more information regarding participation in this deposition remotely.

--- intentionally omitted ---

Dated: March 10, 2021.

Respectfully submitted,

/s/ Eric M. Van Horn

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